

June 15, 2023

CPUC Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
EDTariffUnit@cpuc.ca.gov

Re: Comments of the Vehicle Grid Integration Council to Resolution E-5274: Approval, with Modifications, of Pacific Gas and Electric Company's, Southern California Edison Company's, and San Diego Gas & Electric Company's proposed Plug-In Electric Vehicle Submetering Implementation Plan.

Dear Sir or Madam:

Pursuant to General Order 96-B and the Comment Letter accompanying Draft Resolution E-5274 ("Draft Resolution"), the Vehicle Grid Integration Council ("VGIC")¹ respectfully comments on the proposed approval of Pacific Gas & Electric Company's ("PG&E") Advice Letter ("AL") 6778-E, Southern California Edison Company's ("SCE") AL 4913-E, and San Diego Gas & Electric Company's ("SDG&E") AL 4114-E submitted on December 5, 2022.

The Draft Resolution adopts several important elements of the investor owned utilities' ("IOUs") proposed Plug-In Electric Vehicle ("PEV") submetering implementation plans pursuant to Ordering Paragraph ("OP") 3 of Decision ("D.") 22-08-024. The proposed submetering implementation plans include roles and responsibilities for the IOUs, Meter Data Management Agents ("MDMA"), electric vehicle service providers ("EVSP"), and customers, including PEV submetering data transfer, processing, and dispute resolution. The Draft Resolution approves most of the IOUs' proposed submetering implementation plans but makes the following modifications:

- PG&E and SCE must eliminate 500-customer cap on PEV submetering enrollment during the interim manual billing phase of submetering implementation

¹ VGIC member companies and supporters include American Honda Motor Co., Inc., BorgWarner, bp pulse, Customized Energy Solutions, dcbel, Enel X North America, Inc., Enphase, Fermata Energy, FlexCharging, FLO EV Charging, Ford Motor Company, FreeWire Technologies, Inc., General Motors, GridWiz, Hoosier Energy, Innovation Core SEI, IoTecha, Kaluza, Kitu Systems, Ninedot Energy, Nissan Group of North America, Nuvve Holding Corporation, Peak Power, Qcells, Sacramento Municipal Utility District, Stellantis N.V., Sunrun, The Mobility House, Toyota Motor North America, Inc., Utilidata, Veloce Energy, Inc., Wallbox USA Inc., and WeaveGrid. The views expressed in these Comments are those of VGIC, and do not necessarily reflect the views of all individual VGIC member companies or supporters. (<https://www.vgicouncil.org/>)

June 15, 2023

Page 2 of 2

- SCE must immediately begin system updates to enable automated submetering processing, rather than waiting until there is “sufficient customer demand”
- IOUs should require monthly data transfers from MDMAs, rather than daily data transfers
- PG&E and SDG&E should ensure tariff language is updated for additional EV rates not proposed in the ALs

D.22-08-024, the subsequent submetering implementation plan ALs, and the Draft Resolution, taken together, represent a critical foundation for the future of electric vehicle (“EV”) charging load management in California. In particular, VGIC strongly supports the broad eligibility supported by D.22-08-024, including single customers of record (“SCOR”) and multiple customers of record (“MCOR”), residential and non-residential customers, unidirectional and bidirectional charging equipment, and embedded and external submeters. This broad eligibility is reaffirmed in the Draft Resolution, which clarifies: “The only limitations the decision places on PEV submetering participation are on simultaneous PEV submetering and NEM participation, which was delayed until legal and technical issues can be resolved.”² This will support residential customer enrollment in compelling EV-specific rates previously limited to separately-metered customers, priority non-exporting bidirectional charging use cases that depend on co-located (i.e., Vehicle-to-Home [“V2H”] and Vehicle-to-Building [“V2B”] backup power and customer bill management), and other use cases that depend on submetering capabilities. Thus, in modifying the ALs to uphold California’s commitment to comprehensively implementing the EV supply equipment (“EVSE”) submetering protocol, the Draft Resolution is a symbol of significant progress toward widespread vehicle-grid integration (“VGI”) operations. Moreover, the EVSE submetering protocol represents an encouraging reflection of the close collaboration between subject matter experts at the Commission, IOUs, and industry stakeholders that has taken place over the past decade, which has culminated here in a momentous outcome that supports California’s broader transportation electrification goals. VGIC is pleased to see that the submetering implementation plans (including the critical components that have been reaffirmed and modified by the Draft Resolution) are consistent with the needs of customers and broader VGI market development.

VGIC is therefore largely supportive of the Draft Resolution. However, we do have minor concerns related to the Draft Resolution’s direction for PG&E and SDG&E to update tariff language for certain EV rates. We also have recommendations related to outstanding implementation issues. These are summarized below and discussed in these comments:

- PG&E should incorporate any tariff language needed to implement submetering protocol into the Day-Ahead Hourly Real Time Price (“DAHRTP-CEV RTP”) from the outset, rather than through a separate Tier 2 Advice Letter filing before or after DAHRTP-CEV RTP is offered to customers.

² Draft Resolution at 19.

June 15, 2023

Page 3 of 2

- Based on recent developments in Application (“A.”) 21-12-006/008, SDG&E should add TOU-A and AL-TOU to the list of tariffs that will be modified to incorporate language directed in D.22-08-024.
- Additional recommendations related to submetering implementation, including:
 - Process to add tariff language to additional rates
 - Future clarifications to EVSE submetering protocol related to external submeters

I. DISCUSSION

- a. **PG&E should incorporate any tariff language needed to implement submetering protocol into the Day-Ahead Hourly Real Time Price (“DAHRTP-CEV RTP”) from the outset, rather than through a separate Tier 2 Advice Letter filing before or after DAHRTP-CEV RTP is offered to customers.**

The Draft Resolution discussion directs PG&E to “file a Tier 2 AL consistent with the tariff language ordered in D.22-08-024, **within 30 days of offering customers enrollment** within the DAHRTP rate” [emphasis added].³ This is internally inconsistent with OP 9 of the Draft Resolution, which states “**Prior to offering customers the option to enroll** in DAHRTP-CEV RTP, PG&E must file a Tier 2 AL to modify the tariff language to be consistent with the EV tariff language ordered in D.22-08-024” [emphasis added].⁴

According to D.22-08-002 and D.22-10-024, PG&E’s DAHRTP-CEV RTP rate is slated to be offered to customers by October 1, 2023. To VGIC’s knowledge, PG&E has not yet filed any AL containing tariff language for the DAHRTP-CEV RTP rate, as of June 15, 2023. Therefore, VGIC recommends the Final Resolution direct PG&E to incorporate EV tariff language ordered in D.22-08-024 into the DAHRTP-CEV RTP tariff from the outset, i.e., the initial filing of the DAHRTP-CEV RTP tariff language, rather than through a separate Tier 2 AL.

However, if the Commission directs PG&E to incorporate the EV submetering language ordered in D.22-08-024 into DAHRTP-CEV RTP via a Tier 2 AL, VGIC recommends this Tier 2 AL be filed *before* customers are given the option to enroll in DAHRTP-CEV RTP. The Discussion language in the Final Resolution should, therefore, be modified to align with the direction of OP 9, i.e. to file the Tier 2 AL *before* enrollment begins rather than 30 days *after* rate enrollment. VGIC is concerned that opening DAHRTP-CEV RTP customer enrollment and then filing updated tariff

³ Draft Resolution at 21.

⁴ Draft Resolution at 25.

June 15, 2023

Page 4 of 2

language within 30 days will create confusion for customers and EVSP/MDMAs looking to work with customers to enable submetering for participation in the DAHRTP-CEV RTP rate.

b. Based on recent developments in Application (“A.”) 21-12-006/008, SDG&E should add TOU-A and AL-TOU to the list of tariffs that will be modified to incorporate language directed in D.22-08-024.

Unlike PG&E and SCE’s ALs, SDG&E’s AL does not include proposed tariff changes in the form of redline tariff sheets modifications. However, SDG&E does detail “additional rules and schedules that may be impacted by the outcome of SDG&E’s Implementation Plan including changes to SDG&E Rule 16, 19, 45 and Schedules EV-TOU, TOU-M, and EV-HP.”⁵ Meanwhile, the Draft Resolution, in response to VGIC’s AL Response, directs SDG&E to update EV-TOU-5 to be consistent with the language directed in D.22-08-024. VGIC supports the addition of EV-TOU-5 to the list of EV-TOU, TOU-M, and EV-HP, as it aligns with the intent of D.22-08-024 to not exclude any customers from submetering eligibility except for those also enrolled in a NEM tariff.

Meanwhile, SDG&E’s proposed Real-Time Pricing (“RTP”) Pilot and Export Compensation Rate Pilot (collectively, “Dynamic Rate Pilots”), is being considered in A.21-12-006. On June 9, SDG&E and seven other parties in A.21-12-006 filed a *Joint Motion of SDG&E et al. for Adoption of Settlement Agreement on A.21-12-008 Regarding Export Compensation Rate Pilot*, which requests that the Commission adopt eligibility for the export compensation rate that includes schedules EV-HP, AL-TOU, and TOU-A.⁶ Presumably, the settling parties chose to include AL-TOU and TOU-A because some meaningful percentage of customers taking service under these rates have EV charging load. Moreover, D.22-08-024 explicitly clarifies that the submetering protocol extends to bidirectional chargers.⁷ SDG&E’s proposed Export Compensation Rate Pilot, if approved, will be the first and only export rate available to SDG&E customers. With this in mind, VGIC believes it is likely that customers on AL-TOU and TOU-A will be interested in participating in the proposed Export Compensation Rate Pilot.

The Final Resolution should, therefore, direct SDG&E to file a Tier 2 Advice Letter to make the necessary revisions to EV-TOU-5, as directed in the Draft Resolution, EV-TOU, TOU-M, and EV-HP as requested in SDG&E AL 4114-E, and AL-TOU and TOU-A due to their proposed inclusion in the Export Compensation Rate Pilot.

c. Additional recommendations related to submetering implementation, including:

⁵ AL 4114-E at 4.

⁶ A.21-12-006 & A.21-12-008, *Joint Motion Of San Diego Gas & Electric Company, The Public Advocates Office, The Utility Consumers’ Action Network, Small Business Utility Advocates, The Utility Reform Network, Alliance For Retail Energy Markets, Direct Access Customer Coalition, Electrify America, LLC, And The Federal Executive Agencies For Adoption Of Settlement Agreement On Application 21-12-008 Regarding Export Compensation Rate Pilot*, filed June 9, 2023, pg. 11.

⁷ D.22-08-024 at 34.

i. Process to add tariff language to additional rates.

A majority of VGIC's feedback in its AL Response and these comments center on the inclusion of certain rate schedules. VGIC notes there may be customers on rates not yet discussed in the submetering implementation AL process, representing use cases that may not yet be clear to stakeholders, that wish to take service under a rate using their authorized submetering equipment. In addition, SCE's 2025 GRC was recently filed, and the Commission and Energy Division staff are working with stakeholders to establish new dynamic rate offerings under the CalFUSE framework in R.22-07-005. It is likely that additional EV or non-technology-specific rate schedules will emerge that EV charging customers may want to enroll in via submetering. VGIC believes the language in D.22-08-024 unambiguously directs the IOUs to incorporate the D.22-08-024 tariff language needed to enable submetering into all future tariffs.

However, the process to initiate modifications to other existing rate schedules to enable submetering remains unclear. With this in mind, VGIC recommends the Commission issue guidance outlining an ongoing process for customers, MDMA's, EVSP's, or other parties to request the IOUs incorporate the D.22-08-024 tariff language into additional rates. VGIC notes that the annual VGI Forum established by D.22-11-040 provides an informal venue to discuss barriers to VGI, which could include rate revisions to enable submetering on additional rate schedules. If the Commission deems the VGI Forum as the appropriate venue for customers, MDMA's, EVSP's, or other parties to recommend utilities modify tariff language to incorporate the language in D.22-08-024, VGIC recommends the Commission consider how to ensure accountability for these utilities such that these tariff revisions are made in a timely fashion.

ii. Future clarifications to EVSE submetering protocol related to external submeters.

D.22-08-024 details the Commission's intent and stated determination to limit ownership of EVSE submetering equipment to align with ownership of the EVSE. While the language used in D.22-08-024 is unambiguous, the precise wording in PEV Submetering Protocol attached to D.22-08-024 may cause confusion on this matter.

The PEV Submetering Protocol attached to D.22-08-024 contains guidance related to both utility-owned and non-utility-owned submeters. The guidance for utility-owned submeters appears to re-affirm existing requirements for utility-owned submeters, which were permitted before D.22-08-024, whereas the guidance for non-utility-owned submeters adopts a new protocol. This new protocol details the process for using WiFi or cellular networks, as well as the 1% lab/2% field accuracy standard, which is all new and specific to non-utility-owned submeters. The attached protocol therefore establishes new rules for non-utility-owned submeters and merely reaffirms the existing structure for utility-owned submeters. However, VGIC has received feedback from industry participants, including prospective MDMA's and EVSP's, that the language in the attached submetering protocol is unclear. VGIC respectfully requests that any future revision of the submetering protocol also be used as an opportunity to clarify and re-affirm the direction of D.22-08-024. While the provisions related to utility ownership of submetering equipment is implicitly clear for embedded submetering equipment (where utility ownership is infeasible), there is a need

June 15, 2023

Page 6 of 2

for clarification for those looking to offer external submetering equipment, for example at Direct Current Fast Charging (“DCFC”) sites or at the point of interconnection.

We respectfully request that the commission clarify that utility-owned external submetering equipment behind the meter (e.g., external submetering equipment at DCFC sites) would be prohibited but that utility-owned external submetering equipment *at the point of interconnection* would be eligible under the submetering protocol.

II. CONCLUSION

VGIC strongly recommends that the Commission adopt the Draft Resolution, modified per VGIC’s above recommendations, during its June 29th voting meeting. VGIC appreciates the opportunity to submit these comments to the Draft Resolution and looks forward to future collaboration with the Commission and IOUs on this initiative.

Respectfully submitted,

/s/ Zach Woogen

Zach Woogen

Senior Policy Manager

Vehicle Grid Integration Council

cc: Michael Truax, Energy Division (Michael.Truax@cpuc.ca.gov)
Paula Gruending, Energy Division (Paula.Gruending@cpuc.ca.gov)
Service lists R.18-12-006